

AFET TO

Corp Environ

P.01

Post-It™ brand fax transmittal memo 7671

of pages

To	DALE PAPAJCICK	From	KEITH NAGEC
Co.		Co.	
Dept.		Phone #	
Fax #		Fax #	

PROTECTION AGENCY

JULEVARD
14-3590Rec'd 8-27-98
Response Due
9-16-98

AUG 24 1998

copy to WLW & KAT
per Mike Thomas
9/3/98XC R CALLAHAN
M. DEREN
W. WESTCERTIFIED MAIL
RETURN RECEIPT REQUESTEDEnvironmental Manager
LTV Steel Company
3001 Dickey Road
East Chicago, Indiana 46312Re: Request for Information Pursuant to Section 104(e) of CERCLA for
LTV Steel, East Chicago, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) is currently investigating the source, extent, and nature of releases of hazardous substances, pollutants, or contaminants pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, including but not limited to the following accidental release at LTV Steel facility in East Chicago, Indiana:

NRC Number	Report Date	Substance	Quantity
436727	May 13, 1998	Perchloroethylene	541 lbs.

Pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request (Request) enclosed. Compliance with the Request is mandatory. Failure to respond fully and truthfully to each and every request within Twenty (20) days of receipt of this letter, or to adequately justify such failure to respond, may result in enforcement action by U.S. EPA and the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of noncompliance, pursuant to Section 104(e)(5) of CERCLA. "Noncompliance" is considered by U.S. EPA to be, not only failure to respond to the Request, but also failure to respond completely and truthfully to each Request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal fines or up to five (5) years of imprisonment or both pursuant to 18 U.S.C. § 1001.

U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, et seq.

Your response to this Request should be mailed to:

Ruth McNamara
Office of Chemical Emergency
Preparedness and Prevention
United States Environmental Protection Agency
77 W. Jackson Boulevard (SC-6J)
Chicago, Illinois 60604

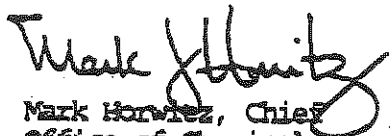
SEP 4 3 204

Please direct any questions you may have regarding this Request to Ruth McNamara at 312/352-3193.

Due to the potential seriousness of the problem at the facility and the legal ramifications of your failure to respond promptly and properly, U.S. EPA strongly encourages you to give this matter your immediate attention and to respond to this Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely yours,


Mark Horwitz, Chief
Office of Chemical Emergency
Preparedness and Prevention

Enclosure: Information Request Definitions
Information Request Instructions
Information Request

DEFINITIONS

For the purpose of the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of the Information Request, the addressee's officers, managers, employees, contractors, trustees, and agents.
2. The term "person" as used herein, in the plural as well as the singular, shall mean any natural person, firm, contractor, corporation, association, partnership, consortium, joint venture, commercial entity, trust or governmental entity, unless the context indicates otherwise.
3. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14) including mixtures of hazardous substances with other substances including petroleum products.
4. The terms "furnish," "describe," or "indicate" shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request, with a written response. If such requested information is not in your possession, custody, or control, then indicate where they may obtain such information or documents.
5. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing of any hazardous substance.
6. "And" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request they might otherwise construe any information which to be outside their scope.
7. The terms "transport" or "transportation" mean the movement of a hazardous substance by any mode, including pipeline, and in the case of a hazardous substance that a common or contract carrier has accepted for transportation, the terms "transport" or "transportation" shall include any stoppage in transit that is temporary, incidental to the transportation movement, and at the ordinary operating convenience of a common or contract carrier, and any such stoppage shall be considered as a continuity of movement and not as the storage of a hazardous substance.
8. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and include any mixtures of such pollutants or contaminants with any other substances.

9. All terms not defined herein shall have their ordinary meaning, unless they define such terms in CERCLA, the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq., as amended, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

INSTRUCTIONS

1. They must make a separate response to each question set forth in this Information Request.
2. Precede each response with the number in the Information Request to which it corresponds.
3. In answering each request, identify all contributing sources of information.
4. If information not known or not available to Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to U.S. EPA. Moreover, should Respondent find, anytime after the submission of its response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify U.S. EPA as soon as possible.
5. Your response must be accompanied by a notarized affidavit from a responsible company official or representative stating Respondent's information in the response is true and accurate to the best of Respondent's knowledge. To the extent that any information you provided relating to these requests is based on your personal knowledge, or personal knowledge of your employees, agents, or representatives, this information shall be in the form of a notarized affidavit.
6. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you want, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36902 at seg. (September 1, 1976); 43 Federal Register 4000 at seg. (December 18, 1985)]. If no such claim accompanies the information when U.S. EPA receives it, U.S. EPA without further notice may make it available to the public to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7), before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA, 42 U.S.C. § 9604(e)(7)(ii).

INFORMATION REQUEST

1. Identify all persons consulted in the preparation of the response to this request.
2. Identify all documentation consulted, examined, or referred to in the preparation of the response to this request and provide copies of all such documents.
3. What is LTV Steel Company's Standard Industrial Classification Code?
4. What is LTV Steel Company's Dun & Bradstreet number?
5. What are LTV Steel Company's annual sales?
6. How many employees are employed at LTV Steel Company, 3001 Dickey Road, East Chicago, Indiana?
7. How many employees are employed at LTV Steel Company corporate wide?
8. Is LTV Steel Company a RCRA facility? If so, provide the EPA Identification Number.
9. Provide the name and current address of the owner(s) of the property located at 3001 Dickey Road, East Chicago, Indiana, during the time period of January 1, 1998, to the present.
10. Provide the name and current address of the operator(s) of the facility located at 3001 Dickey Road, East Chicago, Indiana, during the time period of January 1, 1998, to the present.
11. Provide a copy of your emergency plan which outlines the notification procedures for accidental releases at your facility.
12. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.
13. If LTV Steel Company was a corporation during the time period of January 1, 1998, to the present, provide a copy of the Articles of Incorporation.
14. If LTV Steel Company was a subsidiary of a corporation during the time period of January 1, 1998, to the present, identify the parent corporation and provide copies of pertinent documents supporting the subsidiary relationship.
15. If LTV Steel Company was a division of a corporation during the time period of January 1, 1998, to the present, identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.
16. If LTV Steel Company was a partnership during the time period of January 1, 1998, to the present, provide a copy of the partnership agreement.

17. If LTV Steel Company was a Trust during the time period of January 1, 1998, to the present; provide all relevant agreements and documents to support this claim.
18. Describe in detail the process that produced the release of a hazardous substance which occurred on May 13, 1998.
19. Describe in detail the chain of events that produced the release of a hazardous substance which occurred on May 13, 1998.
20. Identify each hazardous substance released on May 13, 1998, and its Chemical Abstract Service (CAS) number.
21. How much of each hazardous substance was released? Describe your method or source of information in calculating the quantity released and provide the calculations.
22. Describe the surfaces on or to which each hazardous substance was released and how much was released to each surface. Describe your method or source of information in calculating the quantity and provide the calculations.
23. How much of each hazardous substance was released or migrated onto and/or into the soil and/or the subsurface strata? Describe your method or source of information in calculating the quantity and provide the calculations.
24. How much of each hazardous substance volatilized? Describe your method or source of information in calculating the quantity and provide the calculations.
25. How much of each hazardous substance was discharged into the sanitary sewer system? If any, describe the pre-treatment conducted by your facility. Describe your method or source of information in calculating the quantity and provide the calculations.
26. How much of each hazardous substance was discharged into the storm sewer system? Describe your method or source of information in calculating the quantity and provide the calculations.
27. Did the hazardous substance(s) react with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.
28. What was the concentration of each hazardous substance? Describe your method or source of information in determining the concentration.
29. Provide copies of any and all relevant descriptions of each hazardous substance(s) released, i.e., Material Safety Data Sheet (MSDS), Manifest, Analytical Data, etc.

30. Provide the RCRA identification number for each hazardous substance released, if one exists.
31. Provide the results of any and all analyses, including but not limited to sample results, that were conducted regarding this release.
32. Describe in detail the actions that were conducted by your employees and/or anyone else regarding the emergency response to this release, including any and all chemicals used, the handling or clean-up of the substance, including transportation and destination.
33. Was the release contained solely within a building or structure? If so, explain.
34. Did any of the substance(s) released migrate beyond your facility's boundaries? If so, explain.
35. Provide copies of any permits that cover this release, and provide an explanation of why you believe this release is covered by this permit.
36. If the release was to a containment area, please respond to the following Information Requests:
 - (a) What is the containment area made of?
 - (b) What are the dimensions of the containment area?
 - (c) Did the containment area contain a neutralization agent? If so, what and how much of the neutralization agent was present?
37. Provide a diagram of your facility in relation to each of the facility's boundaries, north, east, south, west, and identify the distance between the point of the release and each facility boundary.
38. If the release was from a storage area, i.e., tanker, storage tank, etc., provide the following information:
 - (a) Location of the tank or storage area, inside or outside of a building, ground level, one story up, etc.
 - (b) Location of the leak in relation to the tank or storage area, i.e., top left side, center top, center side, etc.
 - (c) Size of the hole from which the leak occurred.
 - (d) Length of tank or storage area.
 - (e) Diameter of tank or storage area.
 - (f) Duration of the release.
39. Provide the weather conditions at the time of the release including the temperature, humidity, wind speed and direction, precipitation, sunny/cloudy, and barometric conditions.
40. Was the release from a pressurized system? If so, explain and provide the amount of pressure in pounds per square inch (psi).

4

41. If all of the Perchloroethylene in the system was not released on May 13, 1998, how much Perchloroethylene was in the system at the time of the release, and how much Perchloroethylene was left in the system after mitigation of the release?
42. Was the release from a process pipe, a pipe connected to a tank, or a tank? If none of these apply, explain exactly where the release occurred.
43. If the release was from a process pipe or a pipe connected to a tank, provide the dimensions of the piping.
44. Were there any evacuations, hospitalizations and/or deaths associated with this release? If so, describe in detail.
45. Was there any known environmental damage, i.e., fish kills, vegetation damage associated with this release? If so, describe in detail.
46. Provide both the date and time when you first realized that a hazardous substance was released from your facility on May 13, 1998.
47. Provide both the date and time when you first had knowledge that a reportable quantity (RQ) of a hazardous substance(s) was released from your facility on May 13, 1998.
48. Did LTV Steel Company notify the National Response Center regarding the May 13, 1998, release? If so, provide the name of the individual who provided the notification, the agency notified, and the date and time of each call.
49. Did LTV Steel Company notify the Indiana State Emergency Response Commission regarding the May 13, 1998, release? If so, provide the name of the individual who provided the notification, the agency notified, and the date and time of each call.
50. Did LTV Steel Company notify the Lake County Local Emergency Planning Committee regarding the May 13, 1998, release? If so, provide the name of the individual who provided the notification, the agency notified, and the date and time of each call.
51. Did LTV Steel Company provide a written follow-up emergency notice to the Indiana State Emergency Response Commission, as required by EPCRA Section 304(c), 42 U.S.C. § 11004(c)? If so, provide documentation to support your claim.
52. Did LTV Steel Company provide a written follow-up emergency notice to the Lake County Local Emergency Planning Committee, as required by EPCRA Section 304(c), 42 U.S.C. § 11004(c)? If so, provide documentation to support your claim.

 **LTV Steel Company, Inc**
May 19, 1998

Mr. Jason Sewell
Office of Emergency Response
Indiana Department of Environmental Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Mr. William Timmer
Emergency Coordinator
Lake County Local Emergency
Planning Commission
2293 North Main Street
Crown Point, IN 46307

Re: Incident Number 9805087 - LTV Steel Company

Dear Sirs:

This is a follow-up to our telephone call on May 13, 1998 regarding the above referenced incident. A completed emergency release follow-up notice reporting form (Section 304) for Title III releases is enclosed for your records.

If you have any further questions in this matter, please contact me.

Very truly yours,

LTV STEEL COMPANY



Michael A. Deran
Environmental Coordinator -
SARA Compliance, Flat Roll West
Safety & Environmental Services
Indiana Harbor Works

MAD:ms
file
enclosure

bcc: R.P. Callihan - w/o encl.
M.J. Thomas - w/o encl.

W. Wilson - w/encl.
J.E. Kanning - w/encl. file



Contractor spill:
not counted in
monthly in-house
stats.

MD

No. 49

REPORTING EMERGENCIES: SECTION 804 NOTIFICATION

541:4003

EMERGENCY RELEASE FOLLOWUP NOTICE REPORTING FORM
 (SECTION 304)

Business Name & Address: LTV Steel Company - Indiana Harbor Works
3001 Dickey Road, East Chicago, Indiana Take 46312-1610
 Name & Phone of Emergency Contact at Facility: Michael A. Deren (715) 391-2853
 Location of Incident: As Above #2 Pitt Mill
 Date of Incident: 05 11 98 Date & Time of Notification:
☒ Emergency Response Center 5/13/98 at 3:58
☒ State Emergency Response Commission 5/13/98 at 4:02
☒ Local Emergency Planning Committee 5/13/98 at 4:15

Chemical Name (or Trade Name) & CAS Number: Perchloroethylene 127-18-6
 Is the Chemical on the Extremely Hazardous Substances (EHS) List? ☐ Yes ☒ No
 Is the Chemical Release Reportable Under CERCLA 101(a)? ☐ Yes ☒ No
 Physical State Released: ☐ Solid ☒ Liquid ☐ Gas

Time of Release: 1:15 Duration of Release: 1 days
 Physical State Released: ☐ Solid ☒ Liquid ☐ Gas
 Quantity Released: Approx. 400 lbs.
Approx. 40 gal.

Factors Contributing to Release:
☒ Equipment Failure ☐ Transfer of Material
☒ Operator Error ☐ Unusual Weather Conditions
☒ Policy Process Change ☐ Other
 Agencies Notified:
☐ Fire Dept. ☐ Hazardous Materials (Municipal) Unit
☐ Police Dept. ☐ State Agency
☐ Health Dept. ☒ Other See Above

Actions Taken:
☐ Containment ☐ Decontamination of Persons/Equipment ☒ System Shut Down
☐ Cleanup/Neutralization ☐ Evaporation ☒ Monitoring
☐ Material Removal ☐ Change in Release to Treatment ☐ Other

Known or Anticipated Health Effects of Release:
 Acute or Irritant: None Known
 Chronic or Delayed: None Known
 Total Injuries Resulting from Release: 0 Total Hospitalizations Resulting from Release: 0

Advice Regarding Medical Attention for Exposed Individuals:
N/A

Additional Information about the Release (e.g., waste bin which started was released, error in lab or release)
Equipment leak in process equipment using perchloroethylene as solvent into pan and evaporated into air. System shut down when discovered.

I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the submitted information is true, accurate, and complete.

Reporting Facility Representative (print or type) Michael A. Deren

5/13/98

State -

4:02 = about 46

Collected in pans

1CB ~ Copper

9805087 -

JASON SEARLE

10EM/OCER

100 W. Sena Blvd

PO 6015

1204, 46206-605

4:15

Timpan

FAX # 317-308-3168

219-743-4300

793-7300.

-NRC- 100 #KQ

127-18-4

Perchloroethylene

40 Gallon

~ 400 #5

May 13 - 10:00 AM

3:58

Equipment malfunction

436 727

Ruttyford



MICHAEL A. DEREN
Safety & Environmental Services
Indiana Harbor Works

Bill Zepke

Mon

Mike Clare 12:00

2:00 - transport electrolyte

- PAN - Half-full

nothing on floor

ENSR - Came out Tuesday
Sun 09/08

6:00 p.m.

- I need

~~Larry~~

My 15 Empty

395025 N.T

20'x'

1.5

Unit - 2 TM

Unit 46

10

10

WORK SHEET EMERGENCY RELEASE NOTIFICATION

TITLE III EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

This reporting is applicable ONLY for the release of a Reportable Quantity of any "EXTREMELY HAZARDOUS SUBSTANCE" or a CERCLA HAZARDOUS SUBSTANCE which results in exposure to persons OUTSIDE the site boundaries. The following information is for the State and local Title III agencies and is to be reported without delay to the extent the information is known at the time.

LOCAL EMERGENCY RESPONSE AGENCY: W. Timmer PHONE: 219-743-43
 STATE COMMISSION: JASON Sauer PHONE: 317-233-7
 LOCAL COMMITTEE: PHONE:
 NATIONAL RESPONSE CENTER (required under CERCLA 40 CFR 302.6): PHONE: (800) 424-6862
RUTHERFORD #43672

RELEASE INFORMATION

START REPORT WITH ONE OR THE OTHER OF THESE PREFACES:

▶ "This is the () plant located in (). We have a hazardous chemical release in progress and request emergency response from fire and other agencies accordance with prior plans. The emergency release includes a Title III (choose one) "Extremely Hazardous Substance" or a Superfund (CERCLA) Hazardous Substance." The following information is available: (read numbers 1 through 10 below)."

OR

▶ "This is the () plant located in (). This call is to report information only, in compliance with Title III reporting requirements. We have had a reported release but we do not believe it warrants an emergency response. The following information is available: (read numbers 1 through 10 below)."

- CHEMICAL NAME OF SUBSTANCE RELEASED PERCHLOROETHYLENE CASH 127-18-2
- QUANTITY RELEASED (LB) ~ 400
- DATE OF RELEASE EST. 5/11/98
- TIME OF RELEASE ~ 1:15 PM

EMERGENCY RELEASE INFORMATION (continued):

5. DURATION OF RELEASE ~ 24 Hours
6. RELEASE WAS INTO: AIR ☒ SURFACE WATER ☐ SEWER ☐ GROUND ☐
7. ANTICIPATED ACUTE OR CHRONIC HEALTH RISKS: NA
8. ADVICE ON MEDICAL ATTENTION FOR EXPOSED INDIVIDUALS (IF APPROPRIATE):
NA
9. PROPER PRECAUTIONS TO TAKE (INCLUDING EVACUATION IF APPROPRIATE):
NA
10. NAME AND PHONE NO. OF PERSON TO CONTACT FOR FURTHER INFORMATION:
M. DEREN PHONE:
11. RESPONSE ACTIONS TO CONTAIN THE RELEASE: SHUT-DOWN DOWN
AND DISCONNECTED EQUIPMENT

PERSON MAKING NOTIFICATION M DEREN

DATE AND TIME OF CALL AND PERSON RECEIVING THE CALL:

LOCAL RESPONSE AGENCY: ... DATE 5/13 TIME NAME M. Timmer
 STATE COMMISSION: ... DATE 5/13 TIME NAME J. Sewell
 LOCAL COMMITTEE: ... DATE TIME NAME
 NRC (IF APPROPRIATE): ... DATE 5/13 TIME NAME KUTNER
436727

NOTE: IF DECISION WAS MADE NOT TO NOTIFY LOCAL AGENCIES, RECORD REASON:

PAGE 1 OF 1

EVENTS.DOC

INDIANA HARBOR WORKS SAFETY AND ENVIRONMENTAL SERVICES PRELIMINARY REPORT OF EVENTS

DATE: 5/14/98

TIME: 7:15 A.M.

REPORT ISSUED BY: M. DEREN

TO: RJH, TKW, DJP, RLP, RNM, and AFFECTED MANAGERS - J. KEMMING,
B. CAMPBELL, W. WEST

THE NATIONAL RESPONSE CENTER & IDEM WERE NOTIFIED
THAT A RELEASE OF APPROXIMATELY 40 GALLONS OF
PERCHLOROETHYLENE (PCP OF 100 #S) WAS RELEASED AND
EVAPORATED INTO THE AIR. THE RELEASE OCCURRED AT
THE #2 TWMILL AT UNIT 046 TRANSFORMER WHERE
PCP IS USED IN THE PROCESS OF RE-CLASSIFYING
PCB TRANSFORMERS. THE CAUSE OF THE INCIDENT
IS UNDER INVESTIGATION. THE INCIDENT HAPPENED
ON MAY 13 WHILE CONTRACTOR WAS SERVICING
THE UNIT.

MAY 14 '98 01:16PM LTV LINE SHOP

P.1

5/14/98

TRANSFORMER LEAK REPORT

TO: Mike Derea
Environmental Services
IHW

FROM: William Lepak
Utilities Electrical Testing
IHW

Mike, the following is an account of events for transformer #46 at #2 Tin Mill Electrolytic sub starting on Monday afternoon 5/11/98.

- 1) Monday at approximately 13:15 Mike Clear a turn supervisor from the Tin Mill called to our office to report that a transformer was leaking in the Electrolytic sub.**
- 2) Monday at approximately 14:15 we entered the sub and found transformer 46 leaking from an ENSR (SUNOHIO) retrofill unit. The leak was contained by the drip pan that the unit was placed in precisely for this purpose. The drip pan was about half full.**
- 3) We (Bob Miller and myself) proceeded to turn power off of the unit and close all the valves for the lines between the unit and the transformer #46 in order to eliminate the possibility of overflowing the drip pan.**
- 4) At approximately 15:00 on Monday I called Brennan Lyons in order to notify ENSR (SUNOHIO) about the leak.**
- 5) On Tuesday 5/12/98 at approximately 18:00 ENSR (SUNOHIO) technicians arrived at #2 Tin Mill Electrolytic Sub to Service their retrofill unit.**

c.c. J. Kenning
B. Lyons